

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

Blockquarry Corp. f/k/a ISW Holdings, Inc.,

Plaintiff,

v.

Litchain Corp. and Gaffney Board of Public  
Works,

Defendants.

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Gaffney Board of Public Works,

Counter-/Cross-Claimant,

v.

Blockquarry Corp. f/k/a ISW Holdings, Inc.,  
Counterclaim Defendant, and Litchain Corp.,

Crossclaim-Defendant.

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C/A No.: 7:23-cv-01427-TMC

**BLOCKQUARRY’S *UNOPPOSED*  
MOTION FOR ENLARGEMENT OF  
TIME TO RESPOND TO THE  
MOTION FOR PARTIAL DEFAULT  
FILED BY GAFFNEY BOARD OF  
PUBLIC WORKS**

Plaintiff Blockquarry Corp. f/k/a ISW Holdings, Inc. (“Blockquarry”), pursuant to Rule 6 of the Federal Rules of Civil Procedure and Local Civ. Rule 6.01 (D.S.C.), requests the Court enter an order permitting a one-week extension for Blockquarry to file a response to the motion for partial default filed by Defendant and Counter-/Cross-Claimant Gaffney Board of Public Works (the “Utility”) against Defendant/Crossclaim-Defendant Litchain Corp. (“Defendant”) (ECF No. 84, “Motion”). In support thereof, Blockquarry states the following.

The Utility filed its Motion on December 22, 2023, requesting that the Court enter partial default judgment against Defendant. Blockquarry’s deadline to file a response to the Motion is the date of the instant filing—*i.e.*, January 5, 2024. On the evening of January 4, 2024—less than

(24) hours from the instant filing—Blockquarry determined information referenced in the Utility’s Motion could be misleading.<sup>1</sup> The instant request for an extension is, thus, intended to provide additional time for Blockquarry to clarify the record and the facts upon which the Court may enter an order.

The instant motion is not for undue delay or other improper motive, and is for the reasons stated above, exclusively. Blockquarry’s request for a one-week extension would make the new deadline for filing a response January 12, 2024. The requested extension will not affect other deadlines.

Pursuant to Local Civ. Rule 7.02 (D.S.C.), counsel for Blockquarry consulted with counsel for the Utility, in advance of this filing, and the Utility consents to the relief sought herein.

WHEREFORE Blockquarry requests this Court extend its time to respond to the Motion to January 12, 2024.

Respectfully submitted,

January 5, 2024

Greenville, South Carolina

153536711

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*Attorneys for Plaintiff Blockquarry Corp. f/k/a  
ISW Holdings, Inc.*

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<sup>1</sup> On information and belief, the information at issue was relayed to the Utility by third parties (including Blockquarry), and Blockquarry does *not* suggest the Utility has intended to be inaccurate or otherwise lacked diligence in attempting to provide accurate information.